

Defendants United States of America *et al.* (collectively, “United States”), and Plaintiffs Humboldt County and DeLong Ranches, Inc. (“DeLong Ranches”), through undersigned counsel, jointly move this Court for entry of final judgment, as explained more fully below.

WHEREAS, the United States Department of the Interior, Bureau of Land Management (“BLM”), manages certain federal land located in Humboldt County, Nevada, underlying the road right-of-way claims at issue in this action;

WHEREAS, the parties have engaged in settlement negotiations, including court-assisted settlement conferences, in this and a related case, DeLong Ranches, Inc. v. United States, 3:12-cv-669-RCJ-WGC, having participated in seven separate settlement conference sessions with U.S. Magistrate Judge McQuaid on January 7-8, March 5-6, July 29-30, November 5, December 16, 2014, February 10-11 and March 12, 2015;

WHEREAS, through such settlement conferences, the parties wholly resolved 18 road right-of-way claims and partially resolved 2 of the 28 road right-of-way claims alleged in the Complaint via the *Stipulation for Partial Voluntary Dismissal* filed September 12, 2014 (ECF No. 52);

WHEREAS, through such settlement conferences, the parties wholly resolved one additional road right-of-way claim and the remaining portion of one of the 28 road right-of-way claims alleged in the Complaint via the *Second Stipulation for Partial Voluntary Dismissal* filed October 17, 2014 (ECF No. 53);

WHEREAS, through such settlement conferences, the parties resolved the remaining 9 road right-of-way claims alleged in the Complaint via the *Third Stipulation of Partial Voluntary Dismissal*, filed contemporaneously with this Joint Motion; and

WHEREAS, through the above-listed filings, all claims alleged in the Complaint will be resolved and dismissed, and no portion of this case will remain.

NOW, THEREFORE, the parties jointly move the Court to enter a Final Judgment dismissing Plaintiffs' Complaint in accordance with the above-listed filings.

Respectfully submitted, this 5th day of June, 2015.

FOR DEFENDANT UNITED STATES OF
AMERICA:

DANIEL G. BOGDEN
United States Attorney, District of Nevada
GREG ADDINGTON
Assistant United States Attorney
JOHN C. CRUDEN
Acting Assistant Attorney General
Environment and Natural Resources Division

/s/ David L. Negri
DAVID L. NEGRI
Trial Attorney
U.S. Department of Justice

FOR PLAINTIFF HUMBOLDT COUNTY:

MICHAEL MACDONALD
Humboldt County District Attorney

/s/ Michael Macdonald (consent obtained
on June 4, 2015)
Michael Macdonald, NSB No. 6046

FOR PLAINTIFF DELONG RANCHES,
INC.:

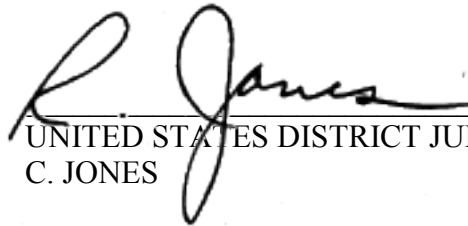
SCHROEDER LAW OFFICES, P.C.

/s/ Therese A. Ure (consent obtained
on June 5, 2015)
Therese A. Ure, NSB No. 10255

SCHROEDER & LEZAMIZ LAW OFFICES,
LLP

/s/ W. Alan Schroeder (consent obtained
on June 5, 2015)
W. Alan Schroeder

IT IS SO ORDERED:

A handwritten signature in black ink, appearing to read "R. Jones", is written over a horizontal line.

UNITED STATES DISTRICT JUDGE, ROBERT
C. JONES

DATED: June 9, 2015

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5th day of June, 2015, the foregoing was electronically filed with the Clerk of the Court and served using the CM/ECF system upon the following parties/attorneys of record:

Michael Macdonald
Humboldt County District Attorney
501 South Bridge Street
P.O. Box 909
Winnemucca, NV 89446
hcda-michael@hcnv.us

Therese A. Ure
SCHROEDER LAW OFFICES, P.C.
440 Marsh Avenue
Reno, NV 89509
counsel@water-law.com

W. Alan Schroeder
Schroeder & Lezamiz Law Offices, LLP
447 West Myrtle Street; PO Box 267
Boise, Idaho 83701-0267
alan@schroederlezamiz.com

/s/ David L. Negri
David L. Negri
United States Department of Justice
Environment & Natural Resources Division
david.negri@usdoj.gov